

Amendments to the Drawings:

The attached sheets of drawings include changes to Figures 1-4.

Attachment: two replacement sheets.

REMARKS

Claims 1-17 will be pending upon entry of the present amendment.

The specification has been amended to correct typographical and grammatical errors. The amendments to the specification do not change the meaning of the texts in question, nor do they add new matter.

The Examiner has objected to Figures 1-4 as requiring a legend such as "Prior Art." Accordingly, drawings - Figures 1-4 have been amended to include the legend "Prior Art" and two sheets of drawings are presented herewith for approval.

The Examiner has rejected claims 14-17 under 35 U.S.C. § 112, first paragraph. The Examiner has stated that the specification is silent regarding "means for increasing flexibility of the substrate, claim 14, line 5" and "a plurality of blind apertures, claim 16, line 2." With regard to support in the specification for the recitation of claim 14 of a means for increasing flexibility of the substrate, applicants call the Examiner's attention to page 6 of the specification, beginning at line 4, which reads:

according to the principles of the invention, a flexible connector is provided having a flexibility that varies over the surface of the substrate. It has greater flexibility in a localized region surrounding contact pads and greater stiffness over the rest of the connector. The greater flexibility may be provided by variations in substrate materials of the connector, or by thinning or removing selected amounts of the substrate of the connector in that region.

It is thus clear that the specification provides a description of at least three means to increase the flexibility of the connector, using different materials, thinning the material or removing the material.

In addition to the above cited reference, the specification discusses several methods and structures for modifying flexibility of a substrate. Thus, ample material is provided in the specification to support a claim reciting means for increasing flexibility of the substrate.

With respect to the question of support in the specification for a plurality of blind apertures as recited in claim 16, applicants call the Examiner's attention to Figures 7 and 8, and to the specification, beginning on page 7, line 11, which reads:

Figures 7 and 8 show a cross-section of the flexible connector of Figure 6, taken at lines VII-VII. In Figure 7 the strain relief structures 52 are shown as apertures that completely traverse, or pass through the substrate material 12 Figure 8

shows a related embodiment, in which the structures 52a are formed by thinning the substrate material at the desired location.

A comparison of Figures 7 and 8 shows that the structures 52 and 52a differ in that the structures 52a do not pass completely through the substrate 12. Such an opening is commonly referred to as a blind aperture. Attached is page 234 of the 1966 Edition of *Webster's Third New International Dictionary The English Language Unabridged*, where a definition of the word blind as used in claim 16 may be found. For the convenience of the Examiner, the relevant section is quoted herein:

8 a : having but one opening or outlet : closed at one end : not permitting passage or flow all the way through

Thus, the specification provides sufficient support for the limitations of claim 16. Claims 14-17 are clearly allowable under 35 U.S.C. § 112.

The Examiner has rejected claims 1, 2, 4, and 6-8 under 35 U.S.C. § 102(b) as being anticipated by Stopperan (5,428,190). Claims 3 and 5 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Stopperan in view of Furnival (3,977,074). Finally, the Examiner has rejected claims 9-17 under 35 U.S.C. § 103(a) as being unpatentable over prior art Figures 1 and 2 in view of Furnival.

Claim 1 recites the following:

1. A device, comprising:
a flexible substrate;
a plurality of contact pads on a first surface of the substrate; and
a strain relief structure, positioned between two of the plurality of contact pads.

In rejecting claim 1 the Examiner has cited the insulating substrate 11 and the contact pads 40, 45, and 50, of Figure 1. The Examiner is of the view that Stopperan shows: "a strain relief structure, which is an aperture penetrating through the flexible substrate 11 from the first surface to a second surface 13, (PTHoles 25, 30, 35, ...) positioned between two of the plurality of contact pads" Applicants disagree, Stopperan fails to teach any kind of strain relief structure associated with the flexible substrate. The PTH holes cited by the Examiner are plated-through-holes (column 2, line 18) and do not function as strain relief structures. They increase the stiffness and do not permit strain relief. Nowhere in Stopperan does he refer to these structures as providing strain relief. One reason for this is that they cannot function as strain relief structures.

Referring now to Stopperan, column 8, beginning at line 24, Stopperan states “conductive layers 15 and 20 are electrically connected through substrate 11 at various points by plated through-holes (PTH), such as holes 25, 30 and 35. Copper barrels 26, 31 and 36, formed along the inner surface of the holes 25, 30 and 35, respectively, provide the necessary electrical connection between the layers.”

As the specification of the present invention explains, metallic contact pads have a tendency to stiffen a connector as the metallic surfaces of the contact pads cover a larger proportion of the surface of the flexible connector. Applicants call the Examiner’s attention to page 4 of the specification, beginning on line 18, which reads “high densities of contacts can locally stiffen the connector in the region of the contacts, inasmuch as the metallic contact pads are not flexible and, as densities increase, the contact pads cover a larger proportion of the surface of the connector in the immediate region.”

Stopperan, explains that the through-holes cited by the Examiner (25, 30, 35) are plated on their surfaces and on the interiors thereof. Referring to Figure 1C it can be seen that the plated through-holes include a significant amount of metal on the surfaces of the flexible connector. As explained in the specification of the present invention, such a configuration will tend to stiffen the substrate, rather than make it more flexible or relieve strain thereon. The mere existence of holes in a substrate does not automatically result in a strain relief structure, particularly in Stopperan in which a very a very rigid material, plated metal, replaces much of the material that was removed.

With reference to the plated through-holes Stopperan states the following “if the thickness of the substrate 11 used is relative thin, for example, a few mils, the length of the copper barrels is therefore also only a few mils . . . , and thermomechanical stress is never a problem,” (column 8, line 65-column 9, line 1). Clearly, Stopperan does not regard the plated through-holes as being strain relief structures, but instead considers the thickness—or rather the thinness—of the substrate used important in preventing the plated through-holes from causing problems due to thermomechanical stress. Thus Stopperan limits the thickness of the substrate to “a few mils”.

The specification, meanwhile, discusses problems associated with the need to use multiple layers in a flexible connector, resulting in a thicker substrate, and discloses structures configured to relieve strain caused thereby. For example, in addition to the previously cited text

from the present invention's specification, see the text found on page 3, beginning on line 28, which reads:

The substrate 12 may have multiple layers of the substrate material to accommodate high densities of circuit traces, with the electrical traces 20 being formed on the outer surfaces of the substrate 12 as well as sandwiched between internal layers. The flexibility of the connector is affected by the number of layers, the thickness of the layers, the adhesives used to bond multiple layers, the coatings on the surfaces of the connector and the overall dimensions of the connector. The number of layers and stiffness of the substrate is chosen to protect the connector 10 and traces 20 from damage caused by excessive flexing and by abrasion. If many layers are needed, due to the complexity of the circuit or the protection needed, the substrate 12 may be stiffer than desired for the electrical properties.

Stopperan is entirely silent on the question of strain relief structures, but instead depends upon an overall structure that is robust enough to withstand the overall strain without localized strain relief. For example, Stopperan states the following "The present invention may be adapted for making multilayered circuits containing many layers so long as the product retains adequate flexibility for a particular purpose" (column 17, lines 60-61). Again, Stopperan limits the thickness of the substrate to a thickness having "adequate flexibility for a particular purpose," and fails to provide a means for increasing local flexibility or relieving local strain beyond the inherent characteristics of the substrate.

Claim 1 contains the further limitation with regard to the specific location of the strain relief structures. In particular, claim 1 states "a strain relief structure, positioned between two of the plurality of contact pads." This feature is not shown in nor suggested by Stopperan. Indeed, Stopperan teaches that the through-holes are to be placed in different locations spaced away from the contact pads and certainly does not teach positioning them in between two of a plurality of contact pads. An examination of Stopperan's Figure 1A shows that none of the plated through-holes 25, 30, or 35 are positioned between any two of the contact pads 40, 45, or 50, as recited by claim 1. Thus, Stopperan fails in this respect as well. Clearly, claim 1 is allowable over Stopperan, together with dependent claims 2-8.

With respect to the Examiner's rejection of claim 8, which recites, in part, "the strain relief structure is positioned such that it interrupts one of the plurality of electrical traces," applicants herein define the term "interrupts," as it is used in this claim, as meaning to break or interrupt the electrical continuity of the recited traces. Support for this interpretation may be found in the specification on page 9, beginning at line 5. Under this interpretation of the term,

the plated through-holes of Stopperan do not interrupt the traces, but on the contrary, enhance the conduction of the traces by electrically coupling them with traces on the opposite side of the substrate. Accordingly, claim 8 is allowable over Stopperan on its own merits, apart from its dependence from an allowable claim.

The rejection of claims 3 and 5 is moot, inasmuch as these are dependent claims from allowable claim 1. Nevertheless, inasmuch as the Examiner has indicated the Furnival reference as suggesting the limitations of claims 3 and 5, Furnival fails to teach a thinned region of the flexible substrate, as recited in claim 4, which is therefore allowable on its own merits.

Claim 9 recites the following:

9. An electrical connector, comprising:
a flexible substrate;
a plurality of contact pads arranged in a regular configuration on a first surface of the substrate;
a plurality of electrical traces on the flexible substrate, each of the plurality of electrical traces being in electrical contact with a respective one of the plurality of contact pads; and
a plurality of apertures penetrating through the flexible substrate, the plurality of apertures arranged in a regular configuration and intercalated into the plurality of contact pads.

Furnival fails to teach a flexible substrate but rather teaches away from a flexible substrate, as found in column 2, line 1, "Figure 1 shows a printed circuit substrate 10 preferably of the rigid variety." Thus, it is inappropriate to combine the teachings of Furnival with the prior art to suggest the device of claim 9. In rejecting claim 9 the Examiner states the following: "Furnival teaches a plurality of apertures penetrating through the flexible substrate, the plurality of apertures arranged in a regular configuration and intercalated into the plurality of contact pads." As pointed out by the applicants in their response to the Office Action of July 19, 2002, Furnival fails to teach any contact pads. The structures described in the figures and text of the Furnival reference are conductive traces and tabs configured to connect traces from one side of the rigid substrate to the other. Accordingly, inasmuch as Furnival fails to teach contact pads, Furnival cannot teach intercalated apertures. For its part, the prior art described in the specification indicates no requirement to make connections from one side of the substrate to another nor does Furnival suggest that the interfacial connections disclosed therein would function properly on a flexible substrate, teaching, rather, that the substrate is preferably rigid. Thus, there is no motivation in either the prior art or Furnival to combine the holes of Furnival

with the connector of claim 9. Additionally, inasmuch as Furnival fails to teach contact pads, or a positional relationship of the holes with reference to contact pads, if the references were combined, there would be no teaching to place the holes among or near the regular configuration of contact pads. Furnival thus fails to add the teaching also missing from Stopperan of having the apertures intercalated with the plurality of contact pads. Accordingly, claim 9 is allowable over the combination of Furnival with the prior art of the specification.

With respect to the rejection of claim 10, as previously indicated, there is no suggestion or motivation to combine the teachings of Furnival with the prior art of the specification. Additionally, again as indicated previously, inasmuch as Furnival is silent on the use of contact pads, or the positioning thereof, there is no teaching by either of the references individually, or by a combination thereof to form a strain relief structure between two contact pads. Accordingly, claim 10 is allowable over the cited prior art. Claims 11-13, as dependent claims from claim 10, are also therefore allowable.

Claim 14 recites the following:

14. (Previously Added) A flexible connector, comprising:
a flexible substrate;
a plurality of contact pads formed on a first surface of the substrate and arranged in a regular configuration in a contact region of the substrate; and
means for increasing flexibility of the substrate in the contact region.

The prior art described in the specification in view of Furnival, fails to teach or suggest means for increasing flexibility of the substrate in the contact region, as recited by claim 14. While the prior art of the specification describes the problems associated with circuit connectors having high densities of contact pads, there is no suggestion in the description of the related art of the specification describing a solution. Thus, in this combination of references, to suggest or anticipate the connector of claim 14 a teaching to increase flexibility of the substrate in the contact region, together with a teaching of the means for doing so must be found in the Furnival reference. Furnival fails in all of the above, as follows: Furnival fails to teach a need to increase flexibility; Furnival fails to teach a contact region structure of any kind; and Furnival fails to provide any teaching as to how such increased flexibility can be achieved. Furnival teaches away from increased flexibility, as previously indicated, teaching the use of a rigid substrate. Where a flexible substrate is incorporated into Furnival's structure, the substrate is bonded to the rigid printed circuit substrate, rendering the flexible substrate rigid therewith.

(column 2, lines 50-55). Where a connector is mentioned by Furnival, Furnival makes clear that that connector is beyond the boundaries of the substrate in question, and offers no teaching or information regarding the nature of that connector. Thus, the prior art of the specification combined with Furnival fails to teach or suggest the connector of claim 14, which is therefore allowable thereover. Claims 15-17 are also allowable, as dependent claims from claim 14.

The examples cited from the specification in support of the allowability of particular claims are cited for clarification of the issues in question, or are used to demonstrate the inadequacy of the cited reference in addressing or enabling the limitations of the particular claim. The scope of the claim in question is not limited to the embodiments or structures disclosed in the cited examples.

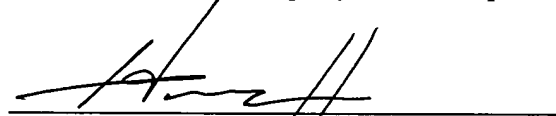
The Commissioner is authorized to charge any additional fees due by way of this Amendment, or credit any overpayment, to our Deposit Account No. 19-1090.

All of the claims remaining in the application are now clearly allowable. Favorable consideration and a Notice of Allowance are earnestly solicited. In the event the Examiner finds minor informalities that can be resolved by telephone conference, the Examiner is urged to contact applicants' undersigned representative at (206) 622-4900 in order to expeditiously resolve prosecution of this application. Consequently, early and favorable action allowing these claims and passing this case to issuance is respectfully solicited.

Respectfully submitted,

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blind test *n* : a test that does not permit passage of milk (as an occluded or inverted test)

blind tiger *n* [prob. so called fr. the evasion of prohibition laws by selling liquor in establishments disguised as halls for exhibiting natural curiosities] *slang* : a place that sells intoxicants illegally : **SPEAKEASY**

blind tire *n* : **BALD TIRE**

blind-tool \b'laɪnd-ˈtuːl/ *v* : to hand-tool (as the cover of a book) without gilding or coloring — compare **BLIND-STAMP**

blind \b'laɪnd/ *n* [prob. *vb* of *bl-* + *ing-*/-s [ME blinken to open one's eyes; prob. akin to MD & G *blinken* to glitter, shine] OHG *blanch* shining, bright, white — more at **BLANK**] *vi* 1 *a* : to look glancingly : **PEEP**, **GLANCE** *b* : to look with half-shut winking eyes (as when obscured from sleep or dazzled by strong light) (seated in her obscure corner ~ing at the fire) (the glare on the snow made us ~) *c* : to open and shut the eye repeatedly or rapidly : wink involuntarily (one eye ~ing and twitching) 2 *light* or *a source of light* *a* : to shine intermittently : **FLICKER**, **TWINKLE** *b* : to shine dimly or uncertainly (sun ~ing through the strands of fog) 3 *a* : to look vaguely 2 *b* : to look with a twinkling eye usu. used with *at* (modern popular philosophy ~s at these facts — M.R. Cohen) *b* : to look with surprise : become startled, amazed, or dismayed — used with *at* (a professional statistician might ~ at the methods though the results seem reasonable) ~ *vi* 1 *obs* : to cause to sour : make sour (as milk or beer) 2 *a* of a sporting dog : to refuse to see and point (game) (his dog *blinked* the first bevy of the day) 3 *a* : to close and open (the eye) involuntarily : **WINK** (he ~ed his tired eyes) *b* : to remove (as tears) from the eye by blinking 4 *chiefly Scot* : to put the evil eye on : **BEWITCH** 5 *a* : to deny recognition to : deliberate (a town ~ed us) — often used in negative constructions (there was no ~ing the fact that she had been worried — Helen Howe) or with *away* (truths that at the turn of the century were firmly ~ed away — Saturday Rev.) *b* : to be aware of : **RECOGNIZE** (if we ~ the truth we must admit our share of responsibility) 6 *a* : to cause to emit flashes or twinkles of light (he ~ed his flashlight to show us the way) *b* : to signal by a blinker

2 *blink* \b'laɪnd-ˈtuːl/ *chiefly Scot* : **GLIMPSE**, **GLANCE** (a view on a bit of empty road, houses, and a ~ of sea — R.L. Stevenson) 3 *a* : brief show of light : **GLEAM**, **GLIMMER**, **SPARKLE** *b* : a moment of brightness : a brief period of time : **INSTANT**, **MOMENT**, **TRICE** 3 *a* : an involuntary shutting and opening of the eye : **WINKING** 4 *dial* : milk that is slightly sour 5 *a* : whitish or mottled appearance of the sky about the horizon caused by the reflection of light from an ice field or from scattered ice — compare **ICEBLINK** *b* : a dark appearance of the sky about the horizon caused by the absence of reflected light due to open water — compare **WATER SKY** — on the blink *adv* (or *adj*) : in or into a disabled or useless condition : **INDISPOSED** : out of order

3 *blink* \b'laɪnd-ˈtuːl/ *adj* : **BLINK-EYED**

4 *blink* \b'laɪnd-ˈtuːl/ *n* [by shortening] : **BLINKER** 3

5 *blink-ard* \b'blɪŋk-(r)ɪd/ *n* -s [blink + -ard] 1 *archaic* : one that blinks with or as if with weak eyes 2 : a stupid, slow-witted, or obtuse person

6 *blink-comparator* *n* : an optical instrument by means of which two pictures identical in all but a few details may be registered in a single visual field and viewed alternately in rapid succession

7 *blinked adj* [fr. past part. of 'blink] : affected with blinking

8 *blink-er* \b'blɪŋk-(r)ɪd/ *n* -s [blink + -er] 1 : one that blinks : as a *archaic* : **COQUETTE**, *b* : a sporting dog that refuses to see and point : game one who holds to a point and flush his game (1) (2) : a device consisting essentially of light that can be flashed on and off regularly as a warning (as at a railway crossing) (2) : a traffic light arranged to blink rather than show a color for a sustained period. (1) (2) : a device consisting essentially of a light that can be flashed on and off in a sequence of coded intervals for signaling a message (as from ship to ship) (2) : a message sent by means of a blinker 2 *a* (1) : **BLINDER** 1 (2) : a cloth hood with shades projecting at the sides of the eye openings used on skittish racehorses usu. used in pl. *b* : something that impairs mental or moral powers : a tinker 3 *a* : a young or undersized mackerel smaller than a tinker

9 *blinker* \b'blɪŋk-(r)ɪd/ *adj* : **BLINKERED**; **BLINKERED**; **BLINKERING** \b'blɪŋk-(r)ɪŋ/ *blinkers* 1 : to put blinders or blinkers on (they ~ed themselves against the facts); *specific* : **HOODWINK** (a person ill-equipped for his task, ~ed as he is by long association with partisan groups) 2 : to send (a message) by means of a blinker (~ed a breakfast invitation from shore — Newsweek)

10 *blinker-adj* : **NARROW**, **OBTUSE**, **LIMITED**

11 *blinker tube* *n* : a tube for confining signals by blinker to a single direction

12 *blink-eyed* \b'laɪnd-ˈtuːl/ *adj* : habitually winking

13 *blinking adj* [fr. pres. part. of 'blink] *slang* *Brit* 1 : **DAMNED**, **BLASTED** (a nuisance) 2 : **COMPLETE**, **UTTER** (a fool)

14 *blink-ingly* *adv* : with blinking eyes : **EVASIVELY**

15 *blink-microscope* *n* : a blink comparator in which the compared images are magnified

16 *blinks pres 3d sing of BLINK*

17 *blinks n, pl blinks* [fr. pl. of 'blink; fr. the fact that the flowers do not open fully] : a small herb (*Montia lamprosperma*) of northern regions — called also *blinking chickweed*, *water chickweed*

18 *blinking* \b'blɪŋk-(r)ɪd/ *adj*, *usu* -ER/-EST [blink + -y] 1 : **BLINKING**, **BLINK-EYED** 2 *dial* : slightly sour — used esp. of milk or beer

19 *blin-ter* \b'blɪnt-(r)ɪd/ *vi* -ED/-ING/-S [prob. freq. of obs. Sc blent to gleam, glance, fr. ME (northern dial.) *blenten*, fr. *blent*, *blenked* past part. of *blenken* to deceive, swerve, gleam, glance, fr. OE *blencan* to deceive — more at **BLEND**] 1 *Scot* : **BLINKER**, **GLIMMER** (the firelight ~ed on her face) 2 *Scot* : **FLICK**

20 *blin-tze* \b'blɪnts-(r)ɪd/ *vi* -ED/-ING/-S [prob. freq. of obs. Sc blintze to gleam, glance, fr. ME (northern dial.) *blinten*, fr. *blent*, *blenked* past part. of *blenken* to deceive, swerve, gleam, glance, fr. OE *blencan* to deceive — more at **BLEND**] 1 *Scot* : **BLINKER**, **GLIMMER** (the firelight ~ed on her face) 2 *Scot* : **FLICK**

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26 *blin-tze* \b'blɪnts-(r)ɪd/ *vi* -ED/-ING/-S [prob. freq. of obs. Sc blintze to gleam, glance, fr. ME (northern dial.) *blinten*, fr. *blent*, *blenked* past part. of *blenken* to deceive, swerve, gleam, glance, fr. OE *blencan* to deceive — more at **BLEND**] 1 *Scot* : **BLINKER**, **GLIMMER** (the firelight ~ed on her face) 2 *Scot* : **FLICK**

27 *blin-tze* \b'blɪnts-(r)ɪd/ *vi* -ED/-ING/-S [prob.